

EXHIBIT 3

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS

GUI GLOBAL PRODUCTS, LTD. d/b/a
GWEE,

Plaintiff,

VS.

SAMSUNG ELECTRONICS CO., LTD.,
AND SAMSUNG ELECTRONICS
AMERICA, INC.,

Defendants.

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4:20-cv-02624-AHB

**DECLARATION OF RHYS BONAHOOM IN SUPPORT OF DEFENDANTS' MOTION
TO TRANSFER VENUE UNDER 28 U.S.C. § 1404(a)**

I, Rhys Bonahoom, declare and state as follows:

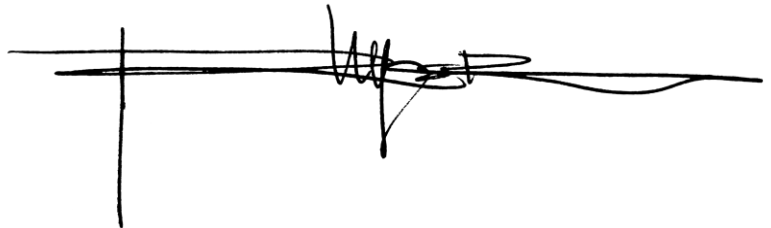
1. I am over 18 years of age and competent to make this declaration. If called as a witness, I could and would testify competently to the information contained herein.

2. I am Head of Industrial Design at Samsung's Design Innovation Center in San Francisco, California ("SDIC"), and I have worked in consumer electronics design related roles at SDIC, formerly known as Samsung Design America, since June 2015. I work out of SDIC's office at 735 Battery Street, San Francisco, California or out of my home in Larkspur, California.

3. In my design roles at SDIC, I was part of the team that conceptualized and designed the product that became the Galaxy Buds for Samsung. We worked on the look and feel of the device, as well as critical functional aspects. In particular, my role was to direct the industrial design, maintain the design integrity through the production process, assist in the procurement of aesthetic mockup creation and co-lead the presentations to upper management.

4. The Galaxy Buds design team maintains at SDIC offices design documents, presentations, and materials related to the work we did to create Galaxy Buds. We also maintain information related to predecessor products that were in the development line of the Galaxy Buds, including other wireless earphone systems. To my understanding, nearly all, if not all, of the technical documents and source code relating to the design and development of the Galaxy Buds resides either with the SDIC design team in San Francisco, California or the product development team resident in Korea.

I declare under penalty of perjury that the foregoing is true and correct. Executed on November 9th, 2020 in San Francisco, California.

A handwritten signature in black ink, appearing to read 'Rhys Bonahoom', is written over a horizontal line. The signature is stylized with loops and a vertical line extending downwards from the left side.

Rhys Bonahoom